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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION – LOS ANGELES**

Frankel, et al.,

Plaintiffs,

v.

Regents of the University of
California, et al.,

Defendants.

Case No. 2:24-CV-4702-MCS

**PARTIES' STIPULATION
EXTENDING DEFENDANTS' TIME
TO RESPOND TO PLAINTIFFS'
COMPLAINT**

**PROPOSED ORDER AND
SUPPORTIVE DECLARATION
FILED CURRENTLY HERewith**

Judge: Hon. Mark C. Scarsi
Courtroom: 7C

PARTIES' STIPULATION EXTENDING
DEFENDANTS' DEADLINE TO RESPOND
TO PLAINTIFFS' COMPLAINT
CASE NO. 2:24-CV-4702-MCS

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1 **TO THE COURT:**

2 Plaintiffs Yitzchok Frankel; Joshua Ghayoum; and Eden Shemuelian
3 (“Plaintiffs”) and Defendants The Regents of the University of California; Michael
4 V. Drake; Gene D. Block; Darnell Hunt; Michael Beck; Monroe Gorden, Jr.; and
5 Rick Braziel (“Defendants”) (collectively, the “Parties”) hereby submit the
6 following Stipulation to Extend Defendants’ Time to Respond to Plaintiffs’
7 Complaint;

8 WHEREAS, on June 5, 2024, Plaintiffs filed the Complaint in the above-
9 captioned action (ECF No. 1);

10 WHEREAS, under Federal Rule of Civil Procedure 12(a), Defendants’
11 current time to respond to the Complaint is July 5, 2024;

12 WHEREAS, the Parties agree to extend Defendants’ time to respond to
13 Plaintiffs’ Complaint by 45 days, from July 5, 2024 to August 19, 2024,
14 Declaration of Matthew R. Cowan (“Cowan Decl.”) ¶ 5;

15 WHEREAS, good cause exists for the agreed-upon extension because
16 Defendants retained O’Melveny & Myers, LLP as counsel on June 17, 2024 and
17 need time to investigate the Complaint and finalize a response to it, *see* Cowan
18 Decl. ¶ 6;

19 WHEREAS, good cause also exists for the agreed-upon extension because
20 Plaintiffs’ Motion for a Preliminary Injunction (ECF No. 48) is still outstanding,
21 *see* Cowan Decl. ¶ 7;

22 **THEREFORE, IT IS HEREBY STIPULATED**, by and between the
23 Parties, that Defendants’ deadline to respond to Plaintiffs’ Complaint shall be
24 August 19, 2024.

1 Dated: June 27, 2024

Respectfully submitted,

2 By: /s/ Matthew R. Cowan

3 MATTHEW R. COWAN
4 *Attorney for Defendants The Regents of*
5 *the University of California; Michael V.*
6 *Drake; Gene D. Block; Darnell Hunt;*
7 *Michael Beck; Monroe Gorden, Jr.;*
8 *and Rick Braziel*

9 /s/ Eric C. Rassbach

10 ERIC C. RASSBACH
11 *Attorney for Plaintiffs Yitzchok*
12 *Frankel; Joshua Ghayoum; and Eden*
13 *Shemuelian*

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4, I hereby attest that the other signature listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: June 27, 2024

Respectfully submitted,

By: /s/ Matthew R. Cowan

MATTHEW R. COWAN

*Attorney for Defendants The Regents of
the University of California; Michael V.
Drake; Gene D. Block; Darnell Hunt;
Michael Beck; Monroe Gorden, Jr.;
and Rick Braziel*